

Exhibit B

Meanith Huon
PO Box 441
Chicago, Illinois 60690
312-405-2789
312-268-7276 FAX No.
Huon.meanith@gmail.com

December 12, 2016

VIA EMAIL, REGULAR MAIL, AND E-FILING

Hon. Judge Stuart M. Bernstein
Courtroom: 723
One Bowling Green
New York, NY 10004-1408

Re: Request to appear via telephonic conference
In re Gawker Media, LLC
Chapter 11
Case No.: 16-11700 (SMB)

Dear Judge Bernstein:

Out of an abundance of caution, I am making the following disclosures under New York Rule 3.3, Conduct before Tribunal, and New York Rule 3.4, Fairness to Opposing Counsel:

I was provided with legal advice and/or information from Charles Harder and the law firm of Harder, Mirell & Abrams LLP in appealing my case against Gawker Media in Huon v. Denton, et. al., Case No.: 15-3049 (7th Circ. 2016.). I was reimbursed for certain of my costs.

I was provided with legal advice and/or information from Charles Harder and Harder's prior firm, the law firm of Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP, in litigating my case against Gawker Media in Huon v. Denton, et. al., Case No.: 11-cv-3054, before the U.S. District Court in the Northern District of Illinois. I was reimbursed for certain of my costs.

I was provided with legal advice and/or information from Michael Kernan, an attorney retained by Charles Harder, in litigating my case against Gawker Media in Huon v. Denton, et. al., Case No.: 11-cv-3054, before the U.S. District Court in the Northern District of Illinois. See attached email correspondence attached as Exhibit "A".

Page 1 of 2

By making these disclosures, I am not waiving the Attorney Client Privilege regarding my communications with the aforesaid attorneys and law firm. Thank you.

Very truly yours,

/s/ Meanith Huon

Meanith Huon

cc: (VIA EMAIL ONLY)
Gregg M. Galardi
Elizabeth Beruit
Jonathan Agudelo
Ropes & Gray, LLP

(VIA EMAIL ONLY)
Mark Tsukerman
Cole Schotz PC



Meanith Huon <huon.meanith@gmail.com>

Emails

1 message

Charles Harder <charder@hmafirm.com>

Mon, Oct 31, 2016 at 10:52 AM

To: Meanith Huon <huon.meanith@gmail.com>

Cc: Dilan Esper <DEsper@hmafirm.com>, Douglas Mirell <dmirell@hmafirm.com>

Meanith: Can you please discontinue emails to my firm? It is not necessary for us to receive them, and we would prefer not to receive them. We wish you good luck with your matter. Thank you. –Charles

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



Gmail

Meanith Huon <huon.meanith@gmail.com>

Status

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Sun, Aug 14, 2016 at 1:52 PM

Hi. What is the status of your appeal? I saw that you were dismissed from the BK proceeding. Are you ending the appeal as to Gawker? Thanks

Charles J. Harder
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212
(424) 203-1600

Sent from iPhone; please excuse any typos.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



Meanith Huon <huon.meanith@gmail.com>

Re: Request for reimbursement/Huon v. Gawker

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Mon, Feb 1, 2016 at 8:24 PM

No problem.

Charles J. Harder
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212
(424) 203-1600

Sent from iPhone; please excuse any typos.

> On Feb 1, 2016, at 5:30 PM, Meanith Huon <huon.meanith@gmail.com> wrote:
>
> Hi Charles:
>
> Do you think your client would be willing to reimburse the Fedex cost for copying and binding of 344.30?
>
> If so, please send a check to: Meanith Huon, PO Box 441, Chicago, IL 60690.
>
> Thanks.
>
>

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



Meanith Huon <huon.meanith@gmail.com>

Appeal

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Wed, Dec 10, 2014 at 11:12 PM

I will pay the fee, so feel free to file the notice of appeal. Do you need someone else to be counsel of record at that time? I plan to find someone to write a draft of the appellate brief for you, but would like to have more time than Jan 3 to find the right person. I probably will have someone in my office draft it and then send the draft to an appellate atty in Chicago for them to review and perhaps put their signature on and file, and to argue the case in court. Sound like a plan?

>



Meanith Huon <huon.meanith@gmail.com>

Your case

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Wed, Dec 11, 2013 at 12:22 PM

Yes, the cavalry is still behind you. We would need to discuss specifics. I would probably retain a contract attorney in Chicago for your case. Any clue when the judge is going to rule on the pending motions?

[REDACTED]

Charles J. Harder
HARDER MIRELL & ABRAMS LLP
1801 Avenue of the Stars, Suite 1120
Los Angeles, California 90067
www.HMAfirm.com
(424) 203-1600

Sent from my iPhone



Meanith Huon <huon.meanith@gmail.com>

Opposition

1 message

Charles Harder <charder@hmafirm.com>

Wed, Mar 6, 2013 at 4:53 PM

To: "huon.meanith@gmail.com" <huon.meanith@gmail.com>

I have no further comments to the draft that I sent you earlier, so feel free to file as is or further revise as you see fit.



CHARLES J. HARDER

1801 AVENUE OF THE STARS

SUITE 1120

LOS ANGELES CA 90067

TEL (424) 203-1600

CHARDER@HMAFIRM.COM

www.HMAFIRM.COM

Editor, [ENTERTAINMENT LITIGATION](#) (Oxford University Press, 2011)

Listed, [Top 100 "Power Lawyers" in America](#), *The Hollywood Reporter*

Confidentiality Notice: The information contained in this email and any attachments) to it is intended only for the use of the intended recipient and may be confidential and/or privileged. If any recipient of this communication is not the intended recipient, the unauthorized use, disclosure or copying of this email and any accompanying attachments or other information contained herein is strictly prohibited, and may be unlawful. If you have received this communication in error, please immediately notify the sender by return email, destroy this email, and any and all copies thereof (including any attachments) without reading them or saving them in any manner. Thank you.



Meanith Huon <huon.meanith@gmail.com>

Huon 2-5-13 Response to Defendant's Motion to Dismiss [with SEL Edits]

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Sun, Mar 3, 2013 at 3:52 PM

Meanith: Here's the draft we have so far. It's pretty strong. I was going to take one last look at it on Monday and see if there is anything else to include.
>



HUON 2-5-13 Response to Defendant's Motion to Dismiss [with SEL Edits].doc
198K



Meanith Huon <huon.meanith@gmail.com>

Gawker's Memo re Mtn to Dismiss

1 message

Charles Harder <charder@hmafirm.com>

Tue, Jan 22, 2013 at 6:24 PM

To: "huon.meanith@gmail.com" <huon.meanith@gmail.com>

Meanith: Can you please send me a copy of Gawker's Memo of Ps and As supporting its Motion to Dismiss? I can't seem to find a copy of it, and it is not available at Pacer (Dkt 175). Thank you.

CHARLES J. HARDER



HARDER MIRELL & ABRAMS LLP

1801 AVENUE OF THE STARS

SUITE 1120

LOS ANGELES CA 90067

TEL (424) 203-1600

CHARDER@HMAFIRM.COM

www.HMAFIRM.COM

Editor, [ENTERTAINMENT LITIGATION](#) (Oxford University Press, 2011)

Listed, [Top 100 "Power Lawyers" in America](#), *The Hollywood Reporter*

This message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive e-mails for the addressee), you may not use, copy or disclose to anyone this message or any information contained in this message. If you have received this message in error, please advise the sender by reply e-mail to CHarder@HMAfirm.com, and delete the message. Thank you.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by U.S. Treasury Regulation Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal



Meanith Huon <huon.meanith@gmail.com>

RE: the new york times wrote us up

1 message

Douglas Mirell <dmirell@hmafirm.com>

Mon, May 30, 2016 at 2:26 PM

To: "Meanith Huon Esq. (huon.meanith@gmail.com)" <huon.meanith@gmail.com>

Cc: Dilan Esper <DEsper@hmafirm.com>

Meanith,

Note that Drange's article is now out & does not mention your case:

<http://www.forbes.com/sites/mattdrange/2016/05/30/peter-thiel-hulk-hogan-lawyers-charles-harder/print/>

Doug



DOUGLAS E. MIRELL, ESQ.

HARDER MIRELL & ABRAMS LLP

132 S. RODEO DRIVE, SUITE 301

BEVERLY HILLS, CA 90212-2406

DIRECT: (424) 203-1603

FAX: (424) 203-1671

CELL: (310) 200-4135

DMIRELL@HMAFIRM.COM

WWW.HMAFIRM.COM

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify the sender. Please destroy the original transmission and its attachments without reading or saving in any manner. Thank you, Harder Mirell & Abrams LLP.

(424) 203-1603

<http://www.nytimes.com/2016/05/30/business/media/gawker-case-calls-attention-to-a-go-to-hollywood-lawyer.html? r=0>



WWW.HMAFIRM.COM

Confidentiality Notice: The information contained in this e-mail and any attachments) to it is intended only for the use of the intended recipient and may be confidential and/or privileged. If any recipient of this communication is not the intended recipient, the unauthorized use, disclosure or copying of this email and any accompanying attachments or other information contained herein is prohibited. If you have received this communication in error, please do not read any further, do not save the message, and do not forward the message to anyone, and immediately notify the sender by return email. Thank you.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



Meanith Huon <huon.meanith@gmail.com>

Huon/Gawker

1 message

Douglas Mirell <dmirell@hmafirm.com>

Thu, Apr 14, 2016 at 11:05 AM

To: "Meanith Huon Esq. (huon.meanith@gmail.com)" <huon.meanith@gmail.com>

Cc: Dilan Esper <DEsper@hmafirm.com>

Dear Meanith,

Are we still expecting to receive the appellees' brief today?

Best regards,

Doug



DOUGLAS E. MIRELL, ESQ.

HARDER MIRELL & ABRAMS LLP

132 S. RODEO DRIVE, SUITE 301

BEVERLY HILLS, CA 90212-2406

DIRECT: (424) 203-1603

FAX: (424) 203-1671

CELL: (310) 200-4135

DMIRELL@HMAFIRM.COM

WWW.HMAFIRM.COM

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify the sender. Please destroy the original transmission and its attachments without reading or saving in any manner. Thank you, Harder Mirell & Abrams LLP.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



Meanith Huon <huon.meanith@gmail.com>

RE: 15-3049 Meanith Huon v. Nick Denton, et al "Submit a Brief"

1 message

Dilan Esper <DEsper@hmafirm.com>

Thu, Apr 14, 2016 at 3:42 PM

To: Meanith Huon <huon.meanith@gmail.com>, Douglas Mirell <dmirell@hmafirm.com>, Charles Harder <charder@hmafirm.com>

Meanith:

I will review this and be in touch with you with my thoughts on the reply.

Dilan

From: Meanith Huon [mailto:huon.meanith@gmail.com]

Sent: Thursday, April 14, 2016 12:12 PM

To: Douglas Mirell; Dilan Esper; Charles Harder

Subject: Fwd: 15-3049 Meanith Huon v. Nick Denton, et al "Submit a Brief"

Here you go. Thanks.

----- Forwarded message -----

From: <CA07_CMECFMail@ca7.uscourts.gov>

Date: Thu, Apr 14, 2016 at 2:05 PM

Subject: 15-3049 Meanith Huon v. Nick Denton, et al "Submit a Brief"

To: huon.meanith@gmail.com

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

Seventh Circuit Court of Appeals

Notice of Docket Activity

The following transaction was entered on 04/14/2016 at 2:05:20 PM CDT and filed on 04/14/2016

Case Name: Meanith Huon v. Nick Denton, et al

Case Number: [15-3049](#)

Docket Text:

Submitted appellee brief by CHAD R. BOWMAN for Appellees Nick Denton and Gawker Media. [41] [6743153] [15-3049] (Bowman, Chad)

Notice will be electronically mailed to:

Mr. Meanith Huon, Attorney
Mr. Chad Russell Bowman, Attorney

The following document(s) are associated with this transaction:

Document Description: Submit a Brief

Original Filename: 15-3049, Appellees Brief.pdf

Electronic Document Stamp:

[STAMP acecfStamp_ID=1105395651 [Date=04/14/2016] [FileNumber=6743153-0] [9b557c11a952ea8e103a32568f98d2a41da52ad186315874e3a72867c1ec97295b96c370f6f19872335c0f9ac5a4ca1b647eebf689eb24c5161ab1c9edb3026b]]

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



Meanith Huon <huon.meanith@gmail.com>

RE: 15-3049 Meanith Huon v. Nick Denton, et al "Brief filed"

1 message

Dilan Esper <DEsper@hmafirm.com>

Thu, Jan 28, 2016 at 5:36 PM

To: Meanith Huon <huon.meanith@gmail.com>, Charles Harder <charder@hmafirm.com>, Douglas Mirell <dmirell@hmafirm.com>

Congratulations on completing and filing your brief, Meanith. We were happy to be of assistance. We will obviously be in touch when you receive Gawker's response.

From: Meanith Huon [mailto:huon.meanith@gmail.com]

Sent: Thursday, January 28, 2016 3:33 PM

To: Charles Harder; Dilan Esper; Douglas Mirell; Meanith Huon

Subject: Fwd: 15-3049 Meanith Huon v. Nick Denton, et al "Brief filed"

----- Forwarded message -----

From: <CA07_CMECFMail@ca7.uscourts.gov>

Date: Thu, Jan 28, 2016 at 2:20 PM

Subject: 15-3049 Meanith Huon v. Nick Denton, et al "Brief filed"

To: huon.meanith@gmail.com

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

Seventh Circuit Court of Appeals

Notice of Docket Activity

The following transaction was entered on 01/28/2016 at 2:20:23 PM CST and filed on 01/28/2016

Case Name: Meanith Huon v. Nick Denton, et al

Case Number: [15-3049](#)

Document(s): [Document\(s\)](#)

Docket Text:

Appellant's brief filed by Appellant Meanith Huon. Paper copies due on 02/04/2016 Electronically Transmitted. [31] [6724461] [15-3049] (SK)

Notice will be electronically mailed to:

Amy J. Hansen, Attorney

The following document(s) are associated with this transaction:

Document Description: Brief filed

Original Filename: 15-3049.pdf

Electronic Document Stamp:

[STAMP acecfStamp_ID=1105395651 [Date=01/28/2016] [FileNumber=6724461-0] [6a50e46213324d1284b4469a122978dd4e2d57be82b74b81c2301a51acfda5a75204ce14adfefcf8d6593dba25e0521a6b7dfe5691221e39734aa65125f460cf]]

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



Meanith Huon <huon.meanith@gmail.com>

Huon - Gawker, Breaking Media

1 message

Charles Harder <charder@wrslawyers.com>
To: huon.meanith@gmail.com

Tue, Sep 18, 2012 at 6:25 PM

Meanith:

Please see the attached corporate documents re Gawker entities and Breaking Media.

My corporate associate, who ordered these documents, states: “Nothing indicates the membership, other than Gaby Darbyshire signing as member or managing member in a couple places, Denton signing as manager in one instance, and each of them signing with corporate officer titles (Pres for Denton, and VP and COO for Darbyshire). We’ll see if the California filings say anything substantive ...”

Charles J. Harder, Esq.
WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
11400 W. Olympic Blvd., Ninth Floor
Los Angeles, California 90064
(310) 478-4100 x6605
(310) 479-1422 (fax)
E-Mail: CHarder@WRSLawyers.com

Web: www.WRSlawyers.com

Bio: <http://www.wrslawyers.com/attorneys/charles-harder.asp>

This message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive e-mails for the addressee), you may not use, copy or disclose to anyone this message or any information contained in this message. If you have received this message in error, please advise the sender by reply e-mail to charder@wrslawyers.com, and delete the message. Thank you.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by U.S. Treasury Regulation Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.



Meanith Huon <huon.meanith@gmail.com>

1 message

Fri, Sep 7, 2012 at 7:01 PM

My partner, Les, and I added a few additional edits to the draft TAC. See attached. You can generate a redline using Word, comparing this version with the prior version. Also, please note that the new Gawker defendants are not included in this draft – you would need to add them. I also removed my name and firm’s name from the bottom. You will be filing this yourself. We are simply helping you out at this point. If we have the opportunity to take depositions on your behalf, then at that point we could formally associate into the case, with you.

Charles

Bio: <http://www.wrslawyers.com/attorneys/charles-harder.asp>

This message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive e-mails for the addressee), you may not use, copy or disclose to anyone this message or any information contained in this message. If you have received this message in error, please advise the sender by reply e-mail to charder@wrslawyers.com, and delete the message. Thank you.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by U.S. Treasury Regulation Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.



THIRD AMENDED COMPLAINT.DOCX
67K